



April 9, 2019

United States Environmental Protection Agency
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303-8960

Attention: Mr. Wesley Hardegree
Environmental Engineer

Re: **Quarterly Progress Report #26 January-March 2019**
ERP Compliant Coke, LLC
3500 35th Avenue North
Birmingham, Jefferson County, Alabama
USEPA ID No. ALD 000 828 848
Terracon Project No. E1127096

Dear Mr. Hardegree:

On behalf of ERP Compliant Coke, LLC (ERP Coke), Terracon Consultants, Inc. (Terracon) has prepared Quarterly Progress Report #26 for the work completed from January 1, 2019 to March 31, 2019 for the above-referenced site. This progress report has been prepared in accordance with paragraph 53 of the Order on Consent with effective date of August 1, 2016.

PROGRESS REPORT (JANUARY 1, 2019 THROUGH MARCH 31, 2019)

Corrective Measures Implementation

- n Comments to the Draft Environmental Covenants (ECs) for SMA 4 and 5 were received from EPA on March 8, 2019. Terracon submitted these drafts to the Alabama Department of Environmental Management (ADEM). ADEM and EPA had discussions regarding the Draft EC, and ERP Coke is awaiting additional comments on the Draft EC from EPA.
- n LUCP development is underway and once the comments for the Environmental Covenants are received from EPA, the draft LUCP can be completed and submitted to EPA for review.
- n Horizontal well drilling activities began on December 17, 2018 and concluded on January 12, 2019.
- n The UIC Permit for SMA 4 is dated January 25, 2019 and was received by ERP Coke on January 31, 2019.
- n The response to EPA Comments on Cost Estimates from CMI Work Plan for SMA 4 and SMA 5 were submitted to EPA on October 29, 2018.

Interim Measures

- n Hydraulic Control System was running during this reporting period. The volume of water recovered from January 1, 2019 through March 31, 2019 was 384,030 gallons.
- n Groundwater level measurements and groundwater samples were collected from the monitoring wells in February 2019. These results will be reported to EPA in the next Annual Report which is due by August 30, 2019.

PROJECTED WORK FOR NEXT REPORTING PERIOD (APRIL 1, 2019 THROUGH JUNE 30, 2019)

Corrective Measures Implementation

We anticipate the following activities related to the approved CMI Work Plan to occur:

- Draft LUCP for SMA 4 and SMA 5 submitted to EPA.
- Draft Environmental Covenant submitted to ADEM after we receive EPA's additional comments.
- Completion of vertical wells for Pilot Test.
- Initiation of Pilot Test

Interim Measures/Remediating Monitoring

- n Collect groundwater samples in May 2019.

CLOSING

If you should have any questions, please do not hesitate to contact us at (205) 942-1289.

Sincerely,



Terrell W. Rippstein, AL-PG#8

Principal Geologist

Cc: Meredith Anderson – EPA Region 4
Mr. Don Wiggins – ERP Coke
ADEM